

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada
Nevada Bar Number 13644
ALLISON REESE
Nevada Bar Number 13977
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Email: allison.reese@usdoj.gov
Attorneys for the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANGELO TAYLOR,

Defendant.

Case No.: 2:18-cr-00321-JAD-NJK

**STIPULATION FOR EXTENSION
OF TIME
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Allison Reese, Assistant United States Attorney, counsel for the United States of America, and Paul Riddle, Assistant Federal Public Defender, counsel for Defendant ANGELO TAYLOR, that the date for the Government to file a response to the Defendant's Motion to Suppress Evidence (ECF No. 38) be extended for one week, specifically to **June 11, 2019**.

This stipulation is entered for the following reasons:

1. The Defendant's Motion was filed and served on May 21, 2019. *See* ECF No. 38. The Government's response deadline is presently June 4, 2019.

2. Counsel for the Government was recently hospitalized, so despite her due diligence is in need of additional time to adequately respond to the Defendant's motion.
3. The additional time requested herein is not sought for purposes of delay, but to allow counsel for the Government time to adequately respond to the Defendant's motion.
4. Additionally, denial of this request for continuance could result in a miscarriage of justice.
5. This is the first stipulation filed herein to continue the Government's response deadline.

DATED: June 3, 2019

Respectfully submitted,

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Allison Reese

ALLISON REESE
Assistant United States Attorney

/s/ Paul Riddle

PAUL RIDDLE
Assistant Federal Public Defender
Counsel for Defendant

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 ANGELO TAYLOR,

7 Defendant.

Case No.: 2:18-cr-00321-JAD-NJK

**FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND
ORDER**

8 **FINDINGS OF FACT**

9 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
10 Court finds that:

- 11 1. The Defendant's Motion was filed and served on May 21, 2019. *See* ECF No. 38.
12 The Government's response deadline is presently June 4, 2019.
- 13 2. Counsel for the Government was recently hospitalized, so despite her due diligence
14 is in need of additional time to adequately respond to the Defendant's motion.
- 15 3. The additional time requested herein is not sought for purposes of delay, but to
16 allow counsel for the Government time to adequately respond to the Defendant's
17 motion.
- 18 4. Additionally, denial of this request for continuance could result in a miscarriage of
19 justice.
- 20 5. This is the first stipulation filed herein to continue the Government's response
21 deadline.

22 For all of the above-stated reasons, the ends of justice would best be served by a
23 continuance of the Government's response deadline.
24

1 **CONCLUSIONS OF LAW**

2 The additional time requested herein is not sought for purposes of delay, but to allow the
3 Government with adequate time to respond to the Defendant's motion. The failure to grant said
4 continuance would likely result in a miscarriage of justice.

5 **ORDER**

6 IT IS THEREFORE ORDERED, that the previously-scheduled response deadline for the
7 Government to respond to the Defendant's Motion to Suppress is extended until
8 June 11, 2019. Any reply must be filed no later than June 18, 2019.

9 DATED this 3rd day of June, 2019.

10
11 
12 _____
13 UNITED STATES MAGISTRATE JUDGE
14
15
16
17
18
19
20
21
22
23
24